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10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**  
12 **SACRAMENTO DIVISION**

13  
14 MARGARITA GONZALEZ WHITE, } Case No.: 2:24-cv-03095-CKD  
15 Plaintiff, } STIPULATION AND ORDER FOR AN  
16 vs. } EXTENSION OF TIME  
17 COMMISSIONER OF SOCIAL SECURITY, )  
18 Defendant. }  
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21 Pending the Court's approval, the parties hereby stipulate that the time for Defendant to  
22 respond to Plaintiff's Motion for Summary Judgment be extended seven (7) days from April 11,  
23 2025, up to and including April 18, 2025.

24 This is Defendant's first request for an extension, and it is made with good cause.  
25 Defendant's counsel is consulting with her client regarding issues in this case and is awaiting a  
26 response before she can proceed with defense. Moreover, counsel already has four (4) other  
27 briefs due in the next approximately two (2) weeks, along with other litigation matters and work  
28 required for her role as a coordinator for another jurisdiction. Thus, Defendant requires an

1 extension in this case and requests this extension in good faith and with no intent to delay these  
2 proceedings unnecessarily.

3 The parties further stipulate that the Court's Scheduling Order shall be modified  
4 accordingly.

5 Respectfully submitted,

6 Dated: April 8, 2025

/s/ Josephine Gerrard\*  
(\*as authorized via e-mail on April 8, 2025)  
JOSEPHINE GERRARD  
Attorney for Plaintiff

9 Dated: April 8, 2025

10 MICHELE BECKWITH  
Acting United States Attorney

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12 Associate General Counsel  
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14 By: /s/ Andrea Banks  
15 ANDREA BANKS  
Special Assistant U.S. Attorney  
16 Office of Program Litigation, Office 7

17 Attorneys for Defendant

18 **ORDER**

19 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an  
20 extension, up to and including April 18, 2025, to respond to Plaintiff's Motion for Summary  
21 Judgment.

22 Dated: April 8, 2025

23   
24 CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE

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